



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

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JAN 26 2015

OFFICE OF  
COMPLIANCE AND ENFORCEMENT

Reply To: OCE-082

Ryan Ransavage  
Miles Sand & Gravel Company  
400 Valley Avenue Northeast  
Puyallup, Washington 98371

Re: No Further Action Determination  
Leaking Underground Storage Tank Site at the Auburn Pit & Concrete Batch Plant  
1201 M Street Southeast, Auburn, Washington  
Muckleshoot Indian Reservation, EPA Facility ID No. 409007

Dear Mr. Ransavage:

The U.S. Environmental Protection Agency (EPA) has reviewed the October 13, 2014, cleanup report prepared on your behalf by Blue Sage Environmental, Inc. requesting closure of the above referenced leaking underground storage tank (LUST) site. Based on our review of the site documents listed below, the EPA has determined that no further action at the Auburn pit & concrete batch plant is required at this time. In rendering this determination, the EPA has reviewed the following documents:

1. *Site Soils Characterization and Cleanup Report*. Prepared by Blue Sage Environmental, Inc., October 13, 2014.
2. Notification of Underground Storage Tanks. EPA Form 7530-1 (Rev. 9-98). Signed by Ryan Ransavage on October 10, 2014.
3. Certification of Completed Closure Form. Signed by Alexander H. Koch on October 13, 2014.

After a review of these documents, EPA's understanding of the facts regarding the former Auburn Pit & Concrete Batch Plant LUST site is as follows:

1. Miles Sand & Gravel Company (MS&G) has operated the Auburn pit and concrete batch plant since the 1940s. In October 2009, they sold this property to the Muckleshoot Indian Tribe but leased the property back from the Tribe for a five year period which expires December 31, 2014. At the end of the lease, all structures on the property, including the underground storage tanks (USTs), are to be removed. Three petroleum USTs were installed end to end on the property in 1978 to fuel trucks and equipment related to the sand and gravel operation: 1) a 10,000 gallon unleaded gasoline tank; 2) a 10,000 gallon diesel tank; and, 3) a 20,000 gallon diesel tank. All USTs were cathodically protected steel. The UST system was upgraded in 1998 to include epoxy lined interiors and the addition of a cement skirt along both sides of the UST cover. Prior to that time, site equipment parked on gravel during refueling. The western boundary of the Muckleshoot Indian Reservation runs north-south through the 65-acre property (King County Parcel number 1921059082). However, the tanks were located outside of the reservation and

were previously regulated by the Washington State Department of Ecology (Ecology Facility ID number 87547247).

2. Blue Sage Environmental, Inc., was retained by the Miles Sand & Gravel Company to permanently close the USTs which include the following tasks: 1) remove existing USTs and associated piping and equipment; 2) excavate and remove any contaminated soils; 3) sample the excavation floor and sidewalls for diesel and gasoline range organics (DRO & GRO) and 4) stockpile and treat any contaminated soils on the subject property. The UST system decommissioning and associated site assessment were conducted from September 8-16, 2014. The tanks were observed to be in good condition and were bedded in pea gravel with surrounding native site soils being a mixture of sand, gravel and cobbles. Upon removal of the tanks, petroleum odors and visual sheens were observed around the two diesel tanks, and approximately 100 cubic yards of suspected petroleum contaminated soil (PCS) was removed. Following removal, a total of nine confirmation soil samples were collected from the excavation floor and sidewalls to verify that remaining soils were below Washington State Model Toxics Control Act (MTCA) Method A cleanup levels for gasoline (100 mg/kg) and diesel (2,000 mg/kg). One of these samples collected from the excavation floor beneath the 10,000 gallon diesel tank contained DRO at a concentration of 5,500 mg/kg. All other confirmation samples were either non-detect or contained concentrations of gasoline and diesel below MTCA Method A levels. Following these results, an additional 174 cubic yards of soil was excavated and stockpiled on site, and seven additional confirmation samples were collected and analyzed for DRO. Concentrations of diesel above MTCA Method A cleanup levels were still detected in a single sample collected from the center of the north sidewall adjacent to the 10,000 gallon diesel tank at a depth of 20 feet. Excavation resumed on September 16 and additional 140 cubic yards of suspected PCS was removed and stockpiled on the property. Five additional confirmation samples were collected from the floor and sidewalls of the extended excavation, and concentrations of DRO were not detected in any of the samples. The final UST excavation was 26 feet deep and groundwater was not encountered.
3. In total, approximately 414 cubic yards of PCS or suspected PCS was removed from the UST excavation and stockpiled on site for treatment by landfarming. Soils were placed in piles about two feet deep and treated with an aqueous solution of nutrients to promote microbial degradation. Soils were also turned repeatedly for a two week period to promote oxygenation and aerobic activity. The weather was sunny and dry during this period with day time highs in the 70s. At the end of this period, seven soil samples were collected from the stockpile and analyzed for DRO. All samples were reported at concentrations below MTCA Method A cleanup levels, and MS&G plans on using this material as backfill on the property.

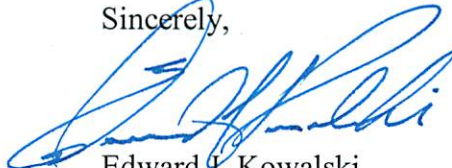
Based upon the information cited above, the EPA has determined that, at this time, the release of petroleum products from this UST system into site soils no longer poses a threat to human health or the environment. Therefore, the EPA is issuing a determination that no further action is necessary at this site under Title 40, Code of Federal Regulations, Part 280, Subparts E and F.

This determination is made only with respect to the release of petroleum products identified in the reports mentioned above. This no further action determination applies only to the Miles Sand & Gravel Company facility located at 1201 M Street Southeast (EPA Facility No. 409007) in Auburn, Washington, which was affected by the release identified in the aforementioned. It does not apply to any other release or potential release at the property or any other areas of the property.

The EPA does not assume any liability for any release, or for any actions taken or omitted by any person or his or her agents or employees with regard to the release, threatened release, or other conditions at the site. However, in the event additional information becomes available indicating the site may pose a hazard to human health or the environment, the EPA may require additional assessment and remediation activity.

If you have any questions or comments regarding this letter, please feel free to contact Rob Rau of my staff at (206) 553-6285 or via email at [rau.rob@epa.gov](mailto:rau.rob@epa.gov).

Sincerely,



Edward J. Kowalski  
Director

cc: Nancy Rapin  
Muckleshoot Indian Tribe

Alexander Koch  
Blue Sage Environmental, Inc.

Kris Grinnell  
Ecology